

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

YUCHEN ZHANG,
a.k.a. “Bin Cui,” “Fang Wang,” and “Ling Jin,”

and

ADISORN DAMRONGCHAI,

Defendants.

UNDER SEAL

Case No. 1:24-MJ-429

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Sam D. Shahrani, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since September 2011. I was first assigned to the FBI’s New York Field Office following completion of my training in February 2012. I was assigned to the Cyber Criminal Computer Intrusion squad from approximately October 2012 until April 2019. From April 2019 until November 2022, I was assigned to the Hi-Tech Organized Crime squad at the FBI’s Washington, D.C. Field Office (“WFO”), in the Northern Virginia Resident Agency (“NVRA”). Since November 2022, I have been assigned to a Transnational Organized Crime squad at the NVRA. My responsibilities include investigation of organized criminal activity under the Major Theft Program and, specifically, investigations pertaining to auto theft and auto parts theft.

2. As an FBI Special Agent, I am an “investigative or law enforcement officer of the United States,” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States

empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 and Title 21 of the U.S. Code.

3. During my employment as an FBI Special Agent, I have participated in investigations involving vehicle thefts, interstate transportation of stolen vehicles, and trafficking in motor vehicles and motor vehicle parts. I have specialized training and experience in the areas of motor vehicle thefts, evidence recovery, and the analysis of digital evidence. As part of this training and experience, I have analyzed phone and internet records, participated in the search and seizure of digital accounts, prepared, and sworn out criminal complaints, and participated in the execution of search and arrest warrants.

4. I am submitting this affidavit in support of an arrest warrant and a criminal complaint charging defendant **Yuchen Zhang** (“ZHANG”), aka “Bin Cui” aka “Ling Jin” aka “Fang Wang”; and **Adisorn Damrongchai** (“DAMRONGCHAI”) with conspiracy to commit interstate transportation of stolen property, in violation of 18 U.S.C. §§ 371 and 2314.

5. The facts and information contained in this affidavit are based upon my personal knowledge of the investigation and information obtained from other state and federal law enforcement officers. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of reports, documents, and other physical evidence obtained during the course of this investigation. This Affidavit is intended to show merely that there is probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my, or the Government’s, knowledge about this matter. I have not, however, intentionally excluded any information known to me that I believe would defeat a determination of probable cause.

BACKGROUND REGARDING AUTO THEFT OFFENSES

6. A vehicle identification number (“VIN”) is a unique number assigned to a given vehicle at the time of manufacture by the vehicle manufacturer. VIN labels, stickers, or marks are located in several very visible places on each new car, such as the inside of the driver’s side door and on the dashboard just inside the front driver’s-side windshield. VINs are also typically affixed to major components such as the engine and transmission. These are “public VINs,” sometimes called P-VINs. VINs are also etched, imprinted, or otherwise applied in concealed or non-obvious locations in a vehicle. These are “secondary VINs,” sometimes called “secret VINs” or S-VINs. In general, the P-VIN and S-VIN of vehicles should match in a legitimate vehicle.

7. When a car is reported stolen, its license plates and its VIN are typically entered by law enforcement into a National Crime Information Center (“NCIC”) database. Law enforcement officers typically run the license plate number and/or VIN of vehicles through the database to determine whether a vehicle has been reported stolen. An officer who recovers or encounters a stolen vehicle can find out from the NCIC system the jurisdiction that received the theft report, the date on which the vehicle was reported stolen, and a description of the stolen vehicle.

8. In certain cases, the license plate or VIN for a stolen vehicle may be affixed to a vehicle that does not match the description of the stolen vehicle, or there may be multiple different VINs located in different areas of one vehicle, which is not normal and may indicate the vehicle is stolen or contains stolen parts. Depending on where the VIN was located, it may also indicate that the vehicle is comprised of multiple parts from other vehicles, which may themselves have been stolen, for instance the motor or transmission of one vehicle being placed into the body of another vehicle.

9. In addition to VINs, certain vehicle parts have serial numbers or other identifying numbers affixed to them that can allow the parts to be traced back to individual vehicles via their assigned VIN. Airbags are one of these vehicle parts.

10. Based on my training and experience I am aware that stolen vehicles, and stolen vehicle parts, are frequently moved across state lines in order to facilitate their sale or disposal. For instance, vehicles and vehicle parts may be loaded into shipping containers for transportation to ports, such as the Port of Baltimore, and then shipped internationally. Stolen vehicles and vehicles parts may also be moved across state lines in order to hamper or evade law enforcement investigations, to facilitate the vehicles or parts being altered to conceal their origins, and to sell the stolen vehicles or items to buyers that may be located in other jurisdictions.

BACKGROUND ON INVESTIGATION

11. Since approximately November 2022¹, FBI has been investigating individuals and groups involved in the theft, transport, dismantlement, and/or shipping of stolen vehicles in the Washington, D.C., Maryland, and Virginia (“DMV”) area. These investigations have so far identified multiple individuals that appear to be involved in different aspects of the auto theft ecosystem. The FBI has also been conducting liaison work with local and state law enforcement in the DMV area to build a more comprehensive understanding of the problem and to enhance the effectiveness of local, state, and federal investigations into these matters.

12. One subject suspected to be involved in airbag theft across the DMV is Yuchen **ZHANG**. **ZHANG** was prosecuted in the Eastern District of Virginia for wire fraud in 2020 in

¹ In affidavits for two previous warrants associated with this investigation, this date was inadvertently altered to read “February 2022” and the error was not caught by your affiant. The correct date that the FBI’s Washington Field Office turned a specific investigative focus to auto theft and auto parts theft operations in the DMV area is approximately November 2022.

Case No. 1:20-CR-226. **ZHANG** was incarcerated with the Bureau of Prisons (BOP) from January 28, 2021, through June 24, 2021, and then transferred into the custody of Immigration and Custody Enforcement (ICE) until he was released on or about October 22, 2021.

13. **ZHANG** violated the terms of his federal supervised release and was incarcerated in the Alexandria Detention Center from April 27 to May 6, 2022.

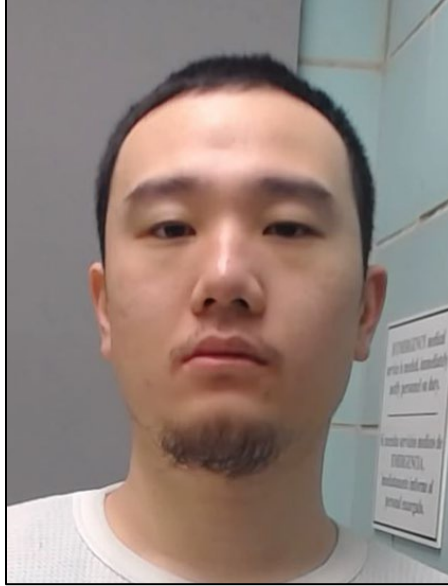
14. **ZHANG** was arrested by Arlington County Police Department (ACPD) officers on or about November 13, 2022, in connection with stealing airbags from vehicles, as described in more detail below. **ZHANG** pleaded guilty to the Arlington charges and was sentenced to three years' incarceration, with two years suspended, and placed on supervised probation for two years.

15. Thereafter, **ZHANG** was found in violation of his federal supervised release again and sentenced to serve an additional six months' imprisonment. He was released on or about February 16, 2024.

16. In summary, since the beginning of 2021, **ZHANG** was in some form of incarceration during the following periods:

- a. January 28 to October 22, 2021
- b. April 27 to May 6, 2022
- c. November 13, 2022, to February 16, 2024

17. A United States Marshals Service (USMS) booking photograph of **ZHANG**, dated August 22, 2023, is included below for reference.



PROBABLE CAUSE

A. Airbag Thefts in the City of Alexandria

18. From in and around August to October 2022, during a period of time when **ZHANG** was not incarcerated, the Alexandria Police Department (“APD”) documented multiple reports of stolen airbags from vehicles in the city of Alexandria. Four of these incidents are described below.

19. On or about August 27, 2022, an airbag was stolen from a vehicle on Strutfield Lane in Alexandria between approximately 2:38 and 2:42 AM. The suspect vehicle was a dark-colored Honda Civic with silver trim on the hood and dual rear exhaust ports. Video surveillance captured a light-skinned male breaking into a white Honda vehicle in the garage. A second person drove the suspect dark Honda around, while the first male subject committed the theft.

20. On or about September 14, 2022, an airbag was stolen from another vehicle on Strutfield Lane in Alexandria. A dark-colored Honda Civic with dual rear exhaust ports and silver trim was observed on video surveillance entering the garage at approximately 11:48 PM. Surveillance video showed a light-skinned Asian male driving the dark-colored Honda Civic and then breaking into a 2014 Honda CRV parked in the garage. Another person was visible in the

suspect dark-colored Honda Civic. The video footage from this location shows the Asian male's face, and the appearance is consistent with **ZHANG**.

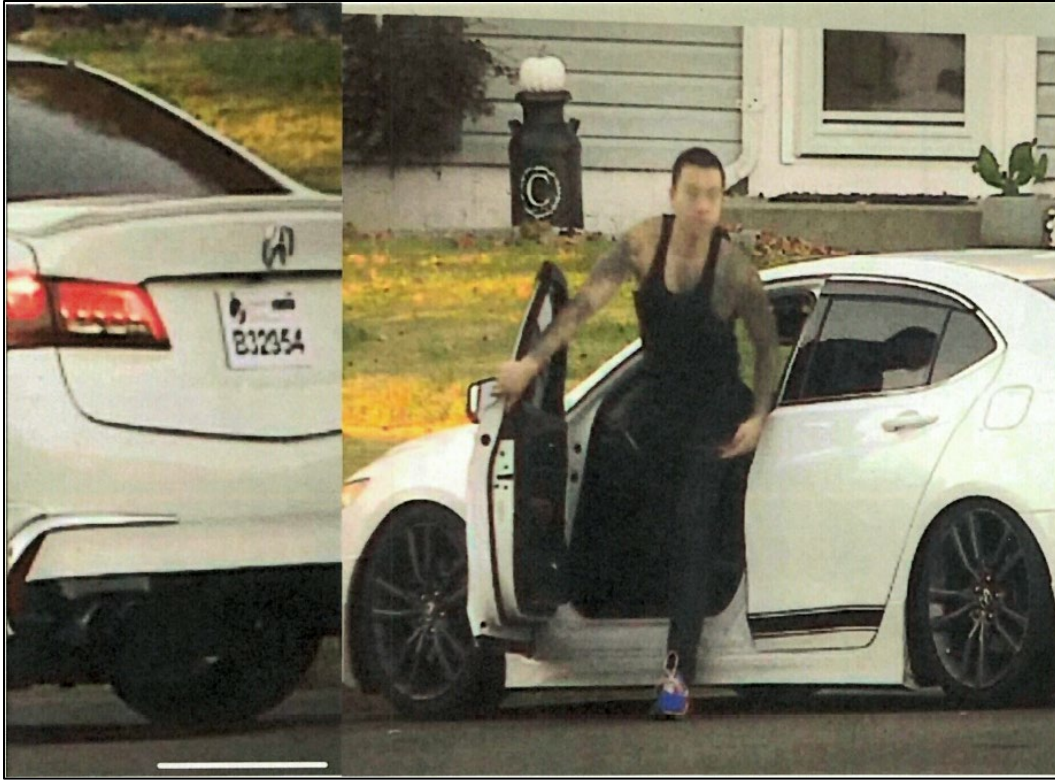
21. On or about September 28, 2022, airbags were stolen from multiple Honda CRVs at a parking lot in Alexandria. Surveillance video showed what appeared to be the same dark-colored Honda Civic, with two rear exhaust ports and silver trim on the hood, entering the parking lot at approximately 1:22 AM. The individual committing the break-ins on the video was consistent in appearance with **ZHANG**, and there was male with a ponytail, consistent in appearance with **DAMRONGHCHAI**, driving the suspect Honda Civic.

B. Identification of ZHANG's Honda Civic

22. Around the time of the airbag thefts in Alexandria, detectives with the Metropolitan Police Department (MPD) identified a vehicle of interest associated with multiple airbags thefts in Washington D.C. The vehicle, identified via license plate reader ("LPR"), was a black Honda Civic bearing Virginia license plate VRM-8922. The vehicle appeared to have distinct dark rims, with dual extended chrome exhaust, and matched the description of the subject vehicle observed in the Alexandria thefts.

23. The black Honda, VA tag VRM-8922, was registered to "Jing Yin" at 9294 Allen Street in Manassas, Virginia. Further law enforcement database checks revealed the vehicle was repeatedly driven by **ZHANG**. Comparison of previous booking photographs of **ZHANG** to the images captured in the surveillance of the thefts led APD to believe that **ZHANG** was the individual committing the airbag thefts.

24. APD conducted surveillance in the vicinity of 9294 Allen Street, Manassas, VA, and captured the black Honda Civic, VRM-8922, at that location being driven by **ZHANG**. The surveillance also captured **ZHANG** operating a white Acura sedan, bearing Virginia temporary license plate B32954, as shown in the below composite of images captured from APD surveillance.



25. A check of Virginia DMV records revealed this white Acura was registered in the name “Bin Cui” at an address located on Quaker (misspelled “Quicker” in the registration) Lane in Alexandria, Virginia.

C. ZHANG’s Arrest in Arlington County

26. As noted above, **ZHANG** was arrested by ACPD officers on November 13, 2022. The arrest occurred after officers initiated a traffic stop of the white Acura, VA temp. tag B32954, following reports of thefts from vehicles that had just occurred in Arlington County. When the officers initiated the stop, **ZHANG** was driving, and **DAMRONGCHAI** was sitting in the front passenger’s seat.

27. On **ZHANG**’s person, officers found a bright orange window punch, an instrument used to break car windows, which could fit in his jacket pocket, as well as a pocket-sized screwdriver and a hand-held flashlight. The officers then initiated a probable cause search of the

vehicle and recovered two more window punches (one keychain-sized and one larger), along with screwdrivers, pliers, and six Acura airbags. **ZHANG** and **DAMRONGCHAI** were both arrested, and as noted above, **ZHANG** remained incarcerated until February 16, 2024.

D. Search of 9294 Allen Street, Manassas, Virginia

28. As stated previously, the black Honda Civic observed in surveillance footage of the thefts in Alexandria was determined to be registered to “Jing Yin” at 9294 Allen Street in Manassas. On or about November 21, 2022, APD obtained a search warrant for this residence. There, law enforcement encountered Jing Yin, who advised that she is **ZHANG**’s mother, and that **ZHANG** stayed in the basement of the house.

29. The search uncovered clothing consistent with that worn by one of the suspects captured in the surveillance footage of the APD thefts. The search also uncovered a folder with Honda makes/models and what appeared to be quantities written on it. Officers did not locate the black Honda Civic, VA tag VRM-8922, at 9294 Allen Street.

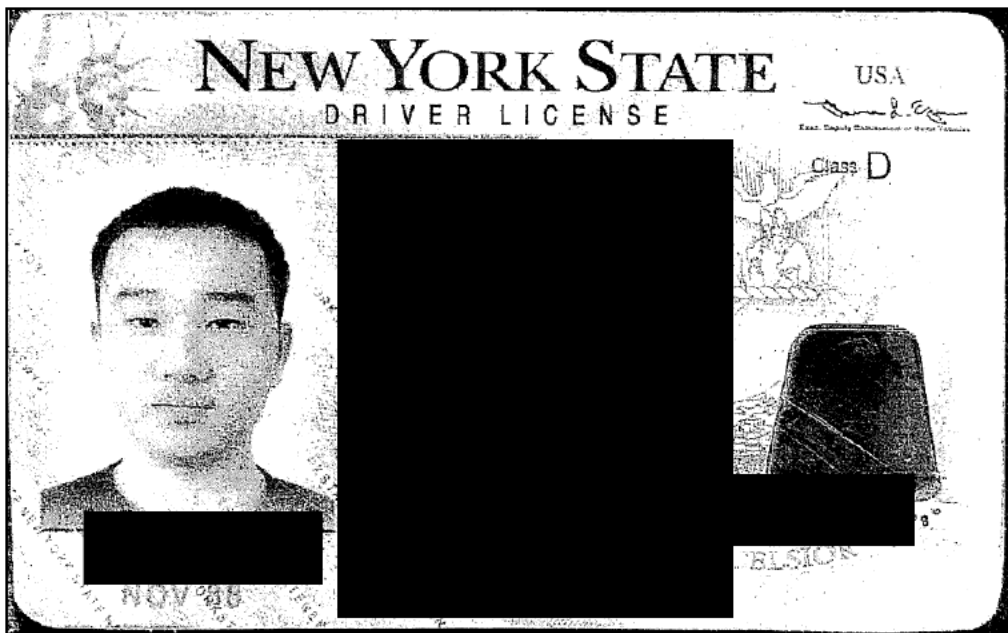
30. Officers did, however, locate documents in the name “Fang Wang” during the search, including insurance paperwork, a PayPal debit card, and a document from PayPal. The insurance document listed an address of 11701 Fairfax Woods Way, Apt #12105, Fairfax, VA 22030. This address is part of The Reserve at Fairfax Corner apartment complex. The PayPal document listed a name of “Fang Wang,” but listed the 9294 Allen Street address. A set of keys on a keyring were found in the basement **ZHANG** was reported to be staying; the key ring had a plastic holder with the number “12105” written on it.

E. The Fairfax Woods Apartment

31. After finding the keys at 9294 Allen Street, APD contacted the leasing office for The Reserve at Fairfax Corner. The leasing office advised that “Fang Wang” was the only lease holder for 11701 Fairfax Woods Way, Apt #12105, and that a white Infiniti Q50, with Virginia

license plate UTX-4926, was also registered to that address. A search of Virginia DMV records for UTX-4926 shows that the vehicle was registered to Jin Ying, **ZHANG**'s mother, at the 9294 Allen Street address.

32. The leasing office provided a photograph of the driver's license associated with the apartment. The image was of a New York state driver's license that bore the name of "Fang Wang" but displayed what appeared to be a photograph of **ZHANG**. A copy of this image, provided by the leasing office, is shown below:



33. A check of New York DMV records by name and date-of-birth showed that the real "Fang Wang" is an Asian female residing in New York. The official New York DMV record contains a different photograph than that displayed on the license photograph in the lease records. The height, sex, ID number, and address listed on the real Fang Wang's New York driver's license were all different from the license included in the leasing documents. My examination of the license revealed that the individual pictured appeared to be **ZHANG**. I therefore believe that **ZHANG** produced, or aided and abetted the production of, a false identification document.

34. The leasing records for apartment 12105 showed the lease had been initiated on September 25, 2020, and it had most recently been renewed on October 5, 2022. Rent was paid via credit card through an online service. The rent for the apartment was \$2,369 as of the October renewal.

35. On or about November 30, 2022, APD executed a search warrant at 11701 Fairfax Woods Way, Apt 12105, in Fairfax, Virginia. As the warrant was being executed, an Asian female fled from the residence and was detained by law enforcement. The woman, identified as Shunjin Cui, presented a valid New York driver's license. A check of her criminal history revealed that Cui had multiple prior arrests in Pennsylvania and New York for prostitution. Cui was subsequently arrested on prostitution charges in Fairfax County.

36. The search of the premises revealed what appeared to be a two-bedroom apartment in which both bedrooms had been converted into massage rooms, with massage tables, towels, and other items. The area did not appear to have any other furniture such as a bed, dresser, or couches. As part of a separate FBI investigation, I had previously assisted with search warrant executions at different locations for apartments suspected to be associated with paid sexual acts, and the layout of this apartment was consistent with what I had previously observed in the unrelated search warrant executions.

37. As pertains to this investigation, the search of the premises revealed mail addressed to "Fang Wang," as well as two white envelopes containing a total of \$3,240 in cash, one white envelope containing \$6,000 in cash, and one white envelope containing \$1,600 in cash. Some of this money was concealed beneath the dishwasher in the kitchen. The black Honda Civic, VA tag VRM-8922, was not located at the Fairfax Woods location.

F. Location and Search of Black Honda Civic, VA Tag VRM-8922

38. On January 24, 2023—while **ZHANG** was in custody on his Arlington County charges—law enforcement located the black Honda Civic, VA tag VRM-8922, in Manassas, Virginia. It was subsequently transported to APD headquarters, and APD obtained and executed a search warrant of the vehicle.

39. During the search, officers recovered a New York driver's license in the name of “Ling Jin” from inside the vehicle. A photograph of the recovered license, provided by APD, is shown below:



40. A search of New York DMV records for the name “Ling Jin” with the listed date of birth did not return any results. A search of New York DMV records for the displayed license number ([REDACTED]) revealed a license in the name Ruby Liu. In addition to a different name, that license had a different height, gender, eye color, date of birth, and address. The image depicted on the license recovered in from the black Honda Civic appears to be **ZHANG**. I therefore believe that **ZHANG** produced, or aided and abetted the production of, a false identification document.

41. The APD investigating officer also located a blue folder with “Tax Return 2020” written on it and the word “Zhang” written below that. Inside the folder was a Department of Homeland Security (DHS) application for employment containing **ZHANG**’s identifying information.

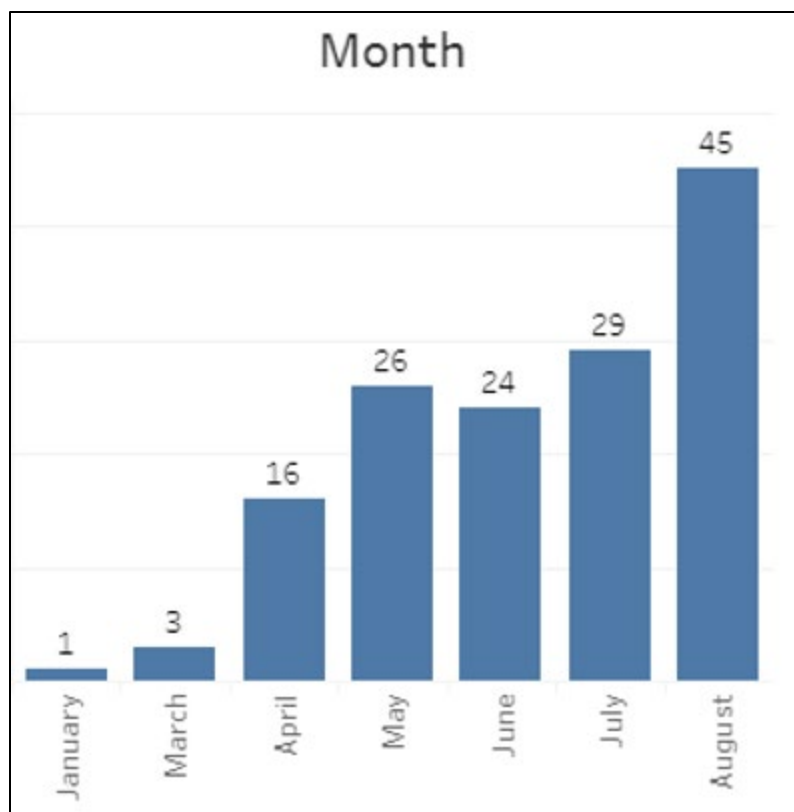
42. The search of the vehicle revealed it had features consistent with the black Honda Civic captured on the surveillance video during the thefts, including two chrome rear extended exhaust ports and two mechanical license plate covers, one for the front license plate and one for the rear license plate of the vehicle. The New York driver’s license, mechanical license plate covers, two screwdrivers, a pair of black wire cutters, and a black and red Milwaukee drill bit located in the vehicle were seized by APD as evidence.

G. 2024 Airbag Thefts in Fairfax County

43. As discussed previously, **ZHANG** was incarcerated in some form from November 13, 2022 (when arrested by ACPD), until February 16, 2024 (when released after serving six months for violating federal supervised release). **ZHANG** is currently on probation for his Arlington County conviction, and his probation officer has advised that he currently resides with his mother, Jing Yin, in Manassas.

44. On or about September 5, 2024, your affiant was notified of a Fairfax County Police Department (FCPD) investigation into a series of airbag thefts occurring in their jurisdiction. The airbag thefts appeared to be focused on Honda vehicles and were occurring during the night or early morning.

45. A review of FCPD records revealed a major increase in reported airbag thefts in FCPD’s jurisdiction after **ZHANG**’s release from prison in February 2024, as shown in the chart below created by FCPD:



46. FCPD's investigation showed that during a reported airbag theft on August 16, 2024, in Reston, Virginia, video surveillance captured a suspect and their vehicle. The vehicle was a black 2024 Subaru WRX with Virginia license plate TJK-5732 (the "black Subaru WRX"). The suspect appeared to be male.

47. A check of Virginia DMV records showed that the vehicle was registered to Jing Yin, **ZHANG**'s mother, at the 9294 Allen Street address in Manassas. The vehicle was purchased on or about May 1, 2024. According to the investigating FCPD detective, a check of license plate reader records showed the black Subaru WRX was in the Reston parking lot on the night of August 16, 2024, the night of the airbag theft, at approximately the same time as the theft occurred. The FCPD detective also reviewed the video surveillance of the incident.

48. Other vehicles that have been observed in the vicinity of the airbag thefts include a silver Honda Pilot, Virginia license plate UCA-4283, which is registered to a female believed to

be **DAMRONGCHAI's** wife; and a black Nissan Sentra, Virginia temporary tag 44743U, registered to Individual-1 (the "black Nissan Sentra"). The black Nissan Sentra previously displayed Virginia temporary tag 55892T but was registered to Individual-1 under both temporary license plates.

49. Surveillance video from a major home improvement retailer showed **ZHANG** operating the black Subaru WRX on or about August 20, 2024. Subsequent FCPD investigation showed the black Subaru WRX driving in the vicinity of Archstone Way in Alexandria, Virginia, which leads toward the Park Place at Van Dorn apartment complex.

H. Identification of the Archstone Way Apartment

50. Records obtained from the Park Place at Van Dorn showed that on or about July 23, 2024, an individual using the name "Bin Cui" applied to lease Unit 102 at 6022 Archstone Way. The move-in date for the applicant was listed as August 2, 2024. An application payment confirmation e-mail, dated July 23, 2024, listed a payment made via a VISA card ending in -7774 and listing the same name and address as shown on the purported California driver license. A subsequent renters insurance policy included the name "Bin Cui" and an "Insured email" of bc714oc@gmail.com. The term of the lease was from August 2, 2024, through August 1, 2025. The total monthly rent for the apartment was listed as \$2,973, with a prorated first month rate of \$2,877.09.

51. The application packet included the below image of what appeared to be a State of California Driver license.



52. On September 17, 2024, I requested that the Los Angeles Field Office of the FBI conduct a search of California DMV records for the name “Bin Cui” with the date of birth displayed on the California license from the leasing company. I also requested a search be conducted of the California DMV records using just the ID number displayed on the license.

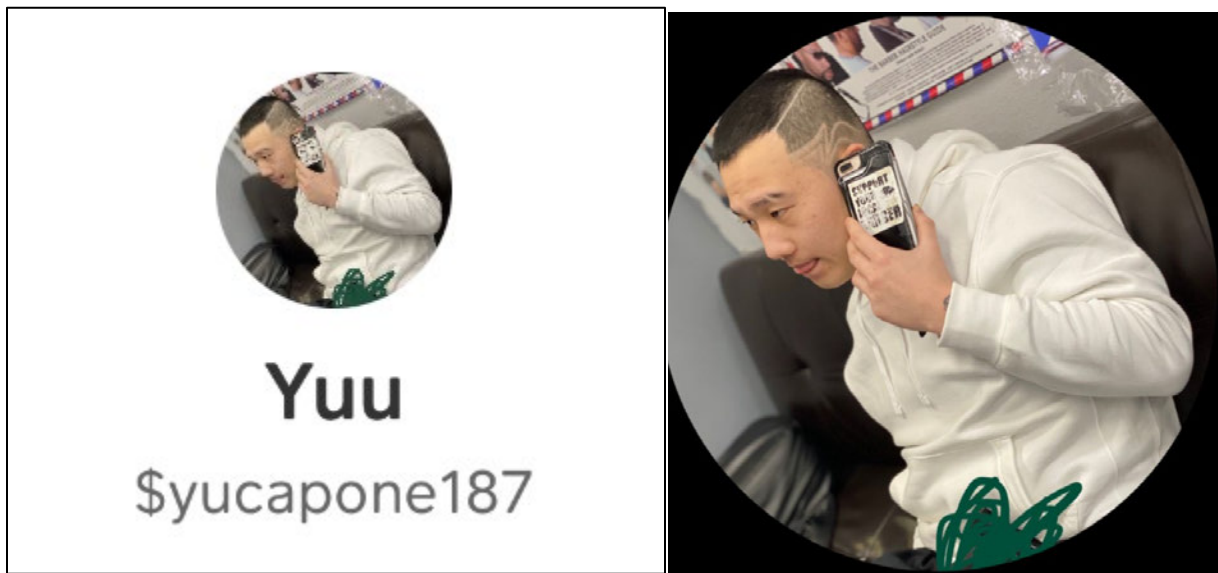
53. The DMV return included a photograph of the real Bin Cui. Based on my comparison of the photographs on the two licenses, the official California DMV photograph did not match the photograph on the purported “Bin Cui” license included in the leasing documents, and instead appeared to display an image of **ZHANG**.

54. The following other discrepancies were noted: the license number for the genuine Bin Cui license was different than the one displayed on the license submitted to the leasing office; the height and weight were also different, with the genuine license displaying a height of 5’9” and a weight of 180 while the license presented to the leasing office displayed a height of 6’1” and 190; finally, the eye color on the genuine license was “BRN” while the license presented to the leasing office displayed “HZL.”

55. Based on my review of the image on the “Bin Cui” license ostensibly from California, and the Virginia DMV photograph of **ZHANG**, and the discrepancies in the license

information, I believe the individual depicted in the fake California “Bin Cui” license is, in fact, **ZHANG**.

56. Another document in the leasing materials included the name “Bin Cui,” the bc714oc@gmail.com email address, the same birthdate listed on the fake California driver license, and a phone number of (464) 206-4244. A search of open source CashApp records for the phone number (464) 206-4244 revealed the number was associated with an account with a display name of “Yuu” and a “CashTag” of \$yucapone187. The profile image associated with the account is displayed below.



57. The lease application identified the applicant’s vehicle as a 2024 Subaru WRX. Associated move-in documents included a copy of a Virginia motor vehicle registration for the black Subaru WRX, in **ZHANG**’s mother’s name (Jing Yin) at the 9294 Allen Street address. The listed purchase date for the black Subaru WRX was May 1, 2024. Based on the matching Virginia license plate number and vehicle description, I believe this is the same vehicle as observed by FCPD on surveillance in the area of the Reston theft.

58. The leasing application identified “Bin Cui’s” emergency contact as a “friend” named “Fang Wang,” which is the name **ZHANG** used to rent the Fairfax Woods apartment. “Fang Wang’s” listed phone number was (571) 365-5538, and his email was reported to be J26374982@gmail.com.

59. A payment recorded through the leasing company’s “Prospect Portal” displayed the name on the card as “Yuchen Zhang” but listed a billing address of the Archstone Way apartment. The card was a Visa ending in 7774.

60. The leasing application also identified “Bin Cui’s” current employer as “Fei Xiang Gong Bbq Inc” located in Los Angeles, California. “Bin Cui’s” reported monthly income was \$12,000. The application further included two separate documents titled “Earnings Statement” in the name “Bin Cui” with an address in Los Angeles. The “Earnings Statements” displayed a company of “Fei Xiang Gong BBQ Inc” in Los Angeles. The documents displayed a partial Social Security Number ending in 7038.

61. The apartment complex’s parking rules and regulations appeared to be hand-signed with a signature or initials beginning with what appeared to be the letter “B.” The leasing office also provided photocopies of six Western Union money orders used for the initial payment to rent the apartment. Five of the money orders were for \$500 each, while the sixth money order was for \$377.09. All six money orders appear to have a signature or initials beginning with the letter “B.”

62. According to information provided by a leasing agent at the property, “Bin Cui” is also renting a garage located in the same building as his apartment. The garage is identified as 104-A (the “Archstone Way garage”).

I. Surveillance activity

63. Recent surveillance by law enforcement has revealed that **ZHANG** and Individual-1 appear to live together at the Archstone Way apartment. **ZHANG** has been observed

driving both the black Subaru WRX and the black Nissan Sentra. The two vehicles have alternately been parked inside the Archstone Way garage or immediately in front of the door to the Archstone Way garage.

64. FCPD placed a Commonwealth of Virginia court-authorized GPS tracking device on the black Subaru WRX. The device operated for several days before **ZHANG** was observed looking over the black Subaru WRX with a flashlight and locating the tracking device. The device was then dropped off in a public location in Manassas, where it was subsequently recovered by FCPD.

65. On Friday, September 20, 2024, at approximately 1:22am **ZHANG** and Individual-1 were observed leaving the area in front of the 104-A garage in the black Nissan Sentra. **ZHANG** appeared to be driving while Individual-1 was in the front passenger seat.

66. An FBI surveillance team followed the vehicle into Silver Spring, Maryland, in the area of Greenly Street. An individual believed to be **ZHANG** was seen leaving a vehicle believed to be the black Nissan Sentra, parked on Greenly, around 2:26 am. The individual believed to be **ZHANG** was carrying a backpack but was lost from view.

67. At around 2:38 am a Honda Civic with Maryland tags was observed on Fredale Street, off of Greenly, with the driver side window broken, approximately a block from where the individual believed to be **ZHANG** was last observed.

68. The black Nissan Sentra returned to the Archstone Way address and parked in front of the Archstone Way garage at approximately 3:39 am. The garage door opened and shortly thereafter the passenger side door of the black Nissan Sentra opened and a person believed to be Individual-1 stepped out. An individual believed to be **ZHANG** then exited the driver seat and both walked through the garage and to a door on the far wall. The garage door then closed.

69. I and another FBI Special Agent responded to Fredale Street in Silver Spring, Maryland, and located the above damaged vehicle. We obtained photographs of the damage, which revealed the driver side window was shattered and the driver side airbag was removed. The vehicle owner reported to the Montgomery County (Maryland) Police Department that the theft occurred between approximately 12:15 AM and 9:00 AM. The estimated value of the airbag on the police report was \$1,500.

70. I believe the activity described above shows **ZHANG** and Individual-1 traveled together in the black Nissan Sentra to Silver Spring, Maryland, and that **ZHANG** committed at least one theft of an airbag and then crossed state lines from Maryland into Virginia with stolen property.

J. Search warrant execution

71. On October 4, 2024, at approximately 12:15am, **ZHANG** entered Individual-1's black Nissan Sentra and drove to a residence associated with **DAMRONGCHAI**. **ZHANG** picked up **DAMRONGCHAI** in the black Nissan Sentra and began driving. Throughout this time **ZHANG**, and subsequently **ZHANG** and **DAMRONGCHAI**, were being followed by an FBI surveillance team.

72. The black Nissan Sentra, driven by **ZHANG** and with **DAMRONGCHAI** as a passenger, traveled to multiple neighborhoods in Fairfax and Herndon, Virginia. The FBI surveillance team noted that while the vehicle was in a neighborhood in Fairfax, the license plates on the vehicle appeared to have changed from Virginia temporary tags to Washington, D.C. plates. After the black Nissan Sentra left the Fairfax neighborhood, **DAMRONGCHAI** was observed removing the D.C. plates and switching them back to the temporary Virginia plates at approximately 1:19 a.m.

73. The black Nissan Sentra traveled to a neighborhood in Herndon, Virginia and the Nissan was observed parked in the neighborhood. **ZHANG** and **DAMRONGCHAI** were observed exiting Individual-1's black Nissan Sentra, both wearing dark clothing. The surveillance team observed an Acura and a Honda with broken driver side windows after **ZHANG** and **DAMRONGCHAI** exited the black Nissan Sentra. The surveillance team captured contemporaneous photographs of the damaged vehicles. Approximately seven minutes after leaving the Nissan, **ZHANG** and **DAMRONGCHAI** returned to the Nissan Sentra and left the area. They then traveled to two other neighborhoods in Herndon before surveillance lost contact with them.

74. **ZHANG** and **DAMRONGCHAI** were observed returning to the Archstone Way garage at approximately 3:53 a.m. and being lost from view after entering the garage. At approximately 4:26 a.m., the garage door opened and **ZHANG** and **DAMRONGCHAI** were observed smoking at the trunk of the Nissan; at 4:35am **ZHANG** and **DAMRONGCHAI** got into the Nissan and **ZHANG** dropped **DAMRONGCHAI** off at **DAMRONGCHAI**'s residence.

75. At **DAMRONGCHAI**'s residence, **DAMRONGCHAI** took a black backpack and a red bag from the Nissan into **DAMRONGCHAI**'s residence. **ZHANG** then returned to his residence at approximately 4:57 a.m. and removed a red/white trash bag from the trunk of the Nissan. **ZHANG** was last observed by surveillance at 5:06am in the Archstone Way garage.

76. At approximately 6:15 a.m. on October 4, 2024, law enforcement executed federal search warrants, authorized by the honorable United States Magistrate Judge Ivan Davis of the Eastern District of Virginia, at the Archstone Way apartment and the Archstone Way garage.

77. In addition to the premises search warrants, search warrants were also served against the black Subaru WRX, which was located in the Archstone Way garage, and the black Nissan Sentra, which was parked immediately outside the Archstone Way garage.

78. Individual-1 was in the Archstone Way apartment. When Individual-1 was initially asked who she lived with, she stated “Bin Cui. Mr. Bin Cui.”

79. **ZHANG** was subsequently located inside the Archstone Way garage. Also located inside the garage was a white plastic garbage bag containing seven Honda airbags and one Acura airbag, as shown below.





80. The serial number on the recovered Acura airbag was associated with the VIN for the Acura observed by the FBI surveillance team on the morning of October 4, 2024. One of the Honda airbag serial numbers was associated with an airbag theft reported to Herndon PD on September 26, 2024. A second Honda airbag serial number was associated with an airbag theft reported to Fairfax PD that occurred on October 4, 2024, in the area of Holly Court in Herndon. Efforts to identify the vehicles associated with the other recovered airbags are ongoing.

81. A black notebook recovered in the Archstone Way garage contained what was determined to be a cryptocurrency, specifically Bitcoin (BTC), seed phrase. Analysis of this seed phrase identified a likely associated wallet. The wallet address was determined to be empty but had moved approximately \$35,000 worth of cryptocurrency to an online gambling site.

82. Three credit cards in the name “Fang Wang” and one credit card in the name “Bin Cui” were seized from the garage. Also in proximity to the cards, but not seized, was a credit card in the name “Yuchen Zhang.” Mail addressed to “Bin Cui” was also located and photographed in

the garage. A black tank top and a headlamp were located and photographed in the garage, along with a variety of tools, including a small hammer-style multitool. A small plastic baggie containing a white crystalline substance was also located in the center console of the WRX. Forensic analysis of this substance is pending.

83. The search of the black Nissan Sentra revealed purple/blue nitrile gloves in the center console of the vehicle. A black and blue Apple iPhone was present on the center console. Analysis of this device is ongoing, but preliminary analysis revealed the device had an app for monitoring police radio frequencies installed on it and the app was set to the Fairfax County frequency. A Washington, D.C. license plate, GU1422, was located between the front passenger side seat and the center console. The back of the license plate had five pieces of black duct tape adhered to it, as shown below.



84. A black Armani Exchange baseball cap, black hooded sweatshirt, and black nitrile gloves were also located in the black Nissan Sentra.

85. In a drawer in the kitchen of the Archstone Way apartment was another Washington, D.C. license plate displaying “GU1422” along with another expired D.C. license plate displaying GR6585. An unassigned Virginia license plate, as well as an issued Virginia license plate in Individual-1’s name for the Nissan Sentra were in the same drawer. A fresh, unapplied DC registration sticker with a tag number of “GR6585” for a 2015 Subaru which had expired in 2022 was also present, along with another fresh, unapplied registration sticker with tag number “GU1422” for a 2015 Hyundai which had expired in 2023.

86. A Washington Gas bill in the name “Bin Cui” was located in the same drawer as the license plates. A glass smoking device with residue was also found in the kitchen, along with two metal punches.

87. A phone, along with a plastic baggie containing a white powder or crystal substance, was located in a bedroom. Analysis of the phone is pending. Analysis of the white powder or crystal substance is pending. Immigration documents in the name “Yuchen Zhang” were also located in the apartment. Two black shirts were located in the washing machine. Several other sets of dark long and short sleeve shirts and pants were located in a closet in one of the bedrooms. One set of pants displayed white lines on the side consistent with that seen in some surveillance footage in some of the airbag thefts. In that same bedroom, in a laundry bag, was another set of black pants with slightly lighter, possibly gray, lines running down the sides.

88. After the searches were completed, **ZHANG** was arrested by FCPD detectives and transported to the Mason District Station.

K. Post-*Miranda* Interview of ZHANG

89. I was later notified by the investigating FCPD Detective that **ZHANG** had agreed to speak with investigators. I traveled to the FCPD Mason District Station after procuring a meal for **ZHANG**. I provided the meal to **ZHANG** and, after he was finished eating, read **ZHANG** his

Miranda rights from an FBI FD-395 Advice of Rights form. **ZHANG** also reviewed the document and initialed his rights and signed the document before agreeing to speak with me. The interview was audio and video recorded by FCPD and took place in an FCPD interview room.

90. During the interview, **ZHANG** admitted that he used the “Bin Cui” identity to rent apartments to be used as illicit massage parlors. **ZHANG** was provided a California driver’s license in the “Bin Cui” name by a third party and used the license to pick up the keys for the apartments that he rented. **ZHANG** originally claimed that he rented the apartments himself online, but later stated that the third party had rented the apartments online and that **ZHANG** merely picked up the keys using the “Bin Cui” license. **ZHANG** would be paid \$1,000 to rent an apartment, and claimed to have only rented the Archstone Way apartment and an apartment in Herndon, Virginia. The “Bin Cui” ID was mailed to **ZHANG**, along with cash payment, although Zelle or CashApp may have also been used to make payments to **ZHANG**. **ZHANG** was instructed that first floor apartments were preferable. The woman who worked in the illicit massage parlors usually lived in the apartments that **ZHANG** rented.

91. **ZHANG** admitted to having previously driven a black Honda Civic and having been stealing airbags since around the middle of 2022 or possibly more towards fall, as **ZHANG** recalled having worn a jacket. **ZHANG** practiced removing airbags on his own Honda. **ZHANG** thought the black Honda had been seized by Alexandria Police Department, but Alexandria had not charged **ZHANG**.

92. **ZHANG** sold the airbags he stole to an individual in Maryland. **ZHANG** only sold the airbags he stole to the individual in Maryland, and almost always drove to Maryland to drop off the airbags and get paid, though at least once the buyer and **ZHANG** met up in Virginia. **ZHANG** typically worked alone, but sometimes worked with another person.

L. DAMRONGCHAI and the FCPD Search Warrant

93. **DAMRONGCHAI** was also present at the Mason District Station after being arrested by FCPD on October 4, 2024, after the execution of the federal warrant at Archstone Way. **DAMRONGCHAI** declined to speak to investigators.

94. The same day, FCPD detectives obtained a state search warrant for **DAMRONGCHAI**'s apartment. During the execution of their warrant, detectives located a black backpack, consistent with that observed by the FBI surveillance team earlier that morning, and a black window punch. Detectives also located six airbags, two of which were confirmed stolen from Loudoun County, Virginia, and one believed to be stolen from Loudoun with verification pending; one airbag confirmed stolen from Fairfax, Virginia, with another confirmation pending; and one airbag stolen from Herndon.

95. In addition to the airbags, FCPD detectives located three boxes of 9mm ammunition in different locations in the residence. **DAMRONGCHAI** is a previously convicted felon and thus prohibited from possessing ammunition pursuant to 18 U.S.C. 922(g)(1).


96. As of October 9, 2024, FCPD investigators have identified at least 224 reports of airbag thefts that occurred between April 12, 2024, and October 4, 2024, targeting Honda and Acura vehicles. These incidents were reported to Fairfax County Police Department, Alexandria City Police Department, Herndon Police Department, Ocean City (Maryland) Police Department, and Manassas City Police Department.

CONCLUSION

97. I submit that this affidavit supports probable cause to believe that, within the Eastern District of Virginia and elsewhere, defendants **Yuchen Zhang** ("**ZHANG**"), aka "Bin Cui" aka "Ling Jin" aka "Fang Wang"; and **Adisorn Damrongchai** ("**DAMRONGCHAI**") did

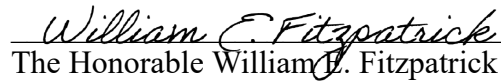
knowingly and unlawfully conspiracy to commit interstate transportation of stolen property, in violation of 18 U.S.C. §§ 371 and 2314.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sam D. Shahrani", written over a horizontal line.

Sam D. Shahrani
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by telephone on October 23, 2024.

A handwritten signature in black ink, appearing to read "William E. Fitzpatrick", written over a horizontal line.

The Honorable William E. Fitzpatrick
United States Magistrate Judge